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8 Attorney for: Plaintiff Shahin Adibi

12 AUG 15 PM 2:09
CLERK U.S. DISTRICT COURT
CENTRAL DIST. OF CALIF.
LOS ANGELES
BY: _____

FILED

9 **UNITED STATES DISTRICT COURT**
10 **CENTRAL DISTRICT OF CALIFORNIA**

11 SHAHIN ADIBI, an Individual;

12
13 Plaintiff,

14 vs.

15 EQUIFAX INFORMATION
16 SERVICES LLC, is a Corporation;
17 NORDSTROM, INC., is a business
entity form unknown;, and DOES 1-10,
Inclusive,

18 Defendants.

Case No. **CV 12-07036 JEM**

COMPLAINT FOR DAMAGES:

1. FAIR CREDIT REPORTING ACT.
2. CALIFORNIA IDENTITY THEFT LAW.
3. ROSENTHAL DEBT COLLECTION PRACTICES ACT.
4. CALIFORNIA CONSUMER CREDIT REPORTING AGENCIES ACT

JURY TRIAL DEMANDED.

22 Plaintiff alleges:

23 1. Plaintiff SHAHIN ADIBI ("Plaintiff") is a resident of County of Los
24 Angeles, State of California.

25 2. Defendants EQUIFAX INFORMATION SERVICES LLC
26 ("EQUIFAX"), is a business entity, forms unknown, doing business in the State of
27 California as credit bureaus which receive negative credit information about
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1 consumers and which then publish such information in credit reports available to
2 its subscribers. Collectively, these defendants will be referred to as "credit bureau
3 defendants" or "credit agency defendants". NORDSTROM, INC.
4 ("NORDSTROM") is a creditor which, among other activities, reports allegedly
5 delinquent debts to credit bureaus and is a "furnisher" under the Fair Credit
6 Reporting Act.

7 3. Defendants DOES 1-10 are individuals and business entities, form
8 unknown, doing business in the State of California as credit reporting agencies,
9 debt collection agencies, creditors or other persons or entities which engage in
10 credit reporting and/or debt collection. DOES 1-10, Inclusive, includes
11 individuals or business entities doing business in the State of California as credit
12 reporting agencies, debt collectors and/or creditors who have refused to delete
13 accounts of plaintiff that were procured through identity theft, mixed file or other
14 manner of recording an inaccurate credit account, even after plaintiff has notified
15 them of the false or inaccurate derogatory, and also who have reported such
16 accounts as derogatory credit references to credit reporting agencies.

17 4. Plaintiff does not know the true names and capacities, whether corporate,
18 partnership, associate, individual or otherwise of Defendants sued herein as Does
19 1 through 10, inclusive, under the provisions of Section 474 of the California
20 Code of Civil Procedure. Plaintiff is informed and believes and on that basis
21 alleges that Defendants Does 1 through 10, inclusive, are in some manner
22 responsible for the acts, occurrences and transactions as officers, directors or
23 managing agents of Defendants or as its agents, servants, employees and/or joint
24 venturers and as set forth in this complaint, and that each of them are legally liable
25 to Plaintiff, as set forth below and herein:

26 a) Said Officers, directors or managing agents of Defendants personally
27 acted willfully with respect to the matters alleged in this complaint;
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1 b) Said officers, directors or managing agents of Defendants personally
2 authorized, approved of, adopted and/or ratified the acts alleged herein or the
3 agents, servants, employees and/or joint venturers of Defendants did so act;

4 c) Said officers, directors or managing agents of Defendants personally
5 participated in the acts alleged herein of Defendants;

6 d) Said Officers, directors or managing agents of Defendants personally had
7 close supervision of their agents, servants, employees and/or joint venturers of
8 Defendants;

9 e) Said Officers, directors or managing agents of Defendants personally
10 were familiar with the facts regarding the matters alleged herein;

11 f) Said Officers, directors or managing agents of Defendants personally
12 failed to investigate the circumstances appertaining to the acts alleged herein.
13 They also failed and refused to repudiate the herein alleged actions and failed to
14 redress the harm done to Plaintiffs. Further, said Officers, directors, or managing
15 agents of Defendants failed and refused to punish or discharge the said agents,
16 servants, employees and/or joint venturers of Defendants, even after learning of
17 the acts of the agents, servants, employees and/or joint venturers of Defendants.
18 Plaintiffs will seek leave to amend this complaint to set forth the true names and
19 capacities of said fictitiously named Defendants as enumerated above, together
20 with appropriate charging allegations, when learned.

21 5. Plaintiff is informed and believes, and thereon allege that at all relevant
22 times herein each Defendant, whether actually or fictitiously named, was the
23 principal, joint venturer, agent, servant or employee of each other Defendant, and
24 in acting as such within the course, scope and authority of such relationship, took
25 some part in the acts and omissions hereinafter set forth, by reason of which each
26 Defendant is liable to Plaintiff for the relief prayed for in this complaint, and any
27 future amended complaint. Further, Plaintiff alleges that each act alleged herein,
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1 whether by a named Defendants or fictitiously named Defendants or otherwise,
2 was expressly authorized or ratified, as these terms are used in California Civil
3 Code Section 3294(b), by each and every other Defendant herein, whether named
4 or fictitiously named.

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6 **FIRST CAUSE OF ACTION**

7 **[VIOLATION OF THE FAIR CREDIT REPORTING ACT**
8 **AGAINST ALL DEFENDANTS]**

9 6. Plaintiff re-alleges and incorporates all preceding paragraphs as though
10 set forth in full in this cause of action.

11 7. Plaintiff is a consumer as this term is defined by 15 U.S.C. Sec. 1681a(c)
12 of the Fair Credit Reporting Act. All defendants are "furnishers" as defined by 15
13 U.S.C. 1681s-2 of the Fair Credit Reporting Act, except, EQUIFAX and each of
14 the credit bureau defendants who are "consumer reporting agencies" as that term is
15 defined in 15 U.S.C. Section 1681a (f).

16 8. On or about February 1, 2011 Plaintiff filed a police report in the city of
17 Los Angeles after he discovered someone unknown to him was using his
18 identification for fraudulent transaction.

19 9. On or about May 8, 2011 Plaintiff sent a dispute letter to NORDSTROM
20 attention Bill Larson. Plaintiff explained that he applied for a Visa card from
21 NORDSTROM but never received it in the mail. When Plaintiff received the
22 statement from NORDSTROM he called them immediately and reported the
23 charges as fraud. Mr. Larsen of the fraud investigation department for
24 NORDSTROM said that Plaintiff had active the card from his cell phone on
25 December 2, 2010 at 2:30 a.m. Plaintiff asked for other evidence proving that he
26 made the charges, but Mr. Larsen was not able to provide any. Plaintiff also
27 provided a copy of his cell phone bill indicating that the first call he made on
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1 December 2, 2010 was around 9:30 a.m. Plaintiff also provided a copy of the
2 police report, which he obtained on February 1, 2011.

3 10. On or about May 23, 2011, Plaintiff sent Dispute letters to, EQUIFAX,
4 Transunion and Experian providing copies of his police report along with proof
5 that he did not activate the Visa Nordstrom account. In addition, Plaintiff asked
6 them to investigate and remove the negative NORDSTROM charge-off account.

7 11. On or about April 15, 2012 and on June 3, 2012, Plaintiff received
8 letters form American Coin Laundry denying his application for a Discover
9 Business Card due to information discovered on his EQUIFAX credit profile.

10 12. On or about May 16, 2012, Plaintiff received a notice from EQUIFAX
11 indicating that the Nordstrom account would remain unchanged on his credit
12 profile. EQUIFAX did however continue the fraud alert and blocked his account
13 for promotional purposes. Transunion and Experian removed the disputed
14 NORDSTROM account.

15 13. Defendants, EQUIFAX and NORDSTROM have refused, despite
16 Plaintiff's phone calls and letters to acknowledge that he was not responsible for
17 the NORDSTROM account.

18 14. Plaintiff sent correspondence to EQUIFAX and NORDSTROM asking
19 that they reinvestigate his account cease any negative credit reporting and remove
20 his account form collection activity. Only non-party Transunion and Experian
21 complied with plaintiff's request to cease the derogatory credit reporting. On
22 information and belief, one or more of the credit bureaus sent dispute notices to
23 NORDSTROM, thereby activating NORDSTROM'S' obligations to plaintiff
24 under the Fair Credit Reporting Act.

25 15. Plaintiff complied with all requests of each of the Defendants to
26 provide information in order to have the erroneous marks removed from her credit
27 reports. Despite the insistence of Plaintiff, the Defendants, and each of them,
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1 failed to correct the errors and failed to undertake sufficient investigations upon
2 being notified of the errors.

3 16. Within the past several years, Defendants, and each of them, willfully
4 violated the provisions of the Fair Credit Reporting Act in *at least* the following
5 respects:

6 a. By willfully and negligently failing, in the preparation of the consumer
7 report concerning Plaintiff, to follow reasonable procedures to assure maximum
8 possible accuracy of the information in the report;

9 b. By willfully and negligently failing to correct, after receiving ample
10 notice, information about the Plaintiff which defendants knew, or should have
11 known, was incomplete and/or inaccurate;

12 c. By willfully and negligently failing to correct and/or delete the
13 incomplete and inaccurate information in Plaintiff's file after conducting an
14 investigation;

15 d. By willfully and negligently failing to conduct an adequate investigation
16 of Plaintiff's complaints, and by willfully and negligently failing to implement
17 corrective actions once the outcome of such investigations were known, or should
18 have been known, to the defendants; and,

19 e. By willfully and negligently failing to follow the provisions of 1681c-1
20 and c-2 with respect to the rights, duties and obligations of identity theft victims
21 who notify creditors and credit bureaus of the identity theft situation.

22 17. As a proximate result of the actions of the Defendants, and each of
23 them, Plaintiff has been damaged in an amount which will be proven at time of
24 trial. As provided under the cited law, Plaintiff is entitled to actual damages, pain
25 and suffering, punitive damages, penalties, costs and attorney fees.

26 18. Plaintiff alleges that defendants, and each of them, have willfully
27 violated FCRA with respect to Plaintiff and towards others similarly situated.
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1 Specifically, defendants deliberately have inefficient procedures for correcting
2 their credit files, because they know that a certain number of consumers will either
3 be intimidated or too frustrated to continuously fight back against the constant
4 onslaught of collection activities for invalid debts. Defendants, and each of them,
5 know that a certain number of consumers would rather pay than fight, even if the
6 debt is not actually owed. These defendants have also specifically violated the
7 provisions of FCRA designed to protect identity theft victims. These defendants
8 know that their systems intimidate consumers so they'll pay debts even if not valid
9 or not completely valid. These facts were not disclosed to the Plaintiff and are not
10 disclosed to the borrowing public at large.

11
12 **SECOND CAUSE OF ACTION**

13 **VIOLATION OF CALIFORNIA IDENTITY THEFT**

14 **LAW, CIV. CODE SECTION 1798.92 et seq.,**

15 **AGAINST NORDSTROM AND DOES 1-10, INCLUSIVE.**

16 19. Plaintiff incorporates all preceding paragraphs as though alleged in full
17 in this cause of action.

18 20. In continuing credit reporting and debt collection activities against
19 plaintiff after she had reported to them the identity theft situation and after
20 providing them with a police report, NORDSTROM and DOES 1-10, Inclusive,
21 willfully violated the California Identity Theft Law, Civ. Code Section 1798.92 et
22 seq.

23 21. Plaintiff has suffered actual damages, including general, special,
24 incidental and consequential damages, and is also entitled to attorney's fees and
25 costs under the California Identity Theft Law. In addition, plaintiff alleges that
26 defendants NORDSTROM and DOES 1-10, Inclusive, specifically violated Civ.
27 Code Section 1798.93 (c) (6), thereby entitling him to a \$30,000.00 penalty, in
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1 addition to any other damages which may be assessed.

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3 **THIRD CAUSE OF ACTION**
4 **VIOLATION OF CALIFORNIA ROSENTHAL ACT**
5 **AGAINST NORDSTROM**
6 **AND DOES 1-10, INCLUSIVE.**

7 22. Plaintiff incorporates all preceding paragraphs as though alleged in full
8 in this cause of action.

9 23. In continuing debt collection activities after the point where plaintiff
10 notified defendants of the identity theft situation, and after she provided them with
11 a police report of the identity theft, defendants NORDSTROM and DOES 1-10,
12 Inclusive, willfully and knowingly violated the California Rosenthal Act, and
13 specifically violated Civ. Code Section 1788.18.

14 24. Plaintiff has suffered actual damages, including general, special,
15 incidental and consequential damages, and is also entitled to attorney's fees and
16 costs under the Rosenthal Act. In addition, plaintiff alleges that defendants
17 NORDSTROM and DOES 1-10, Inclusive, specifically violated Civ. Code Section
18 1788.18, thereby entitling him to a statutory penalty, in addition to any other
19 damages which may be assessed.

20
21 **FOURTH CAUSE OF ACTION**
22 **VIOLATION OF THE CALIFORNIA CONSUMER CREDIT**
23 **REPORTING AGENCIES ACT AGAINST**
24 **NORDSTROM AND DOES 1-10, INCLUSIVE.**

25 25. Plaintiff incorporates all preceding paragraphs as though alleged in full
26 in this cause of action.

1 26. Within two years prior to the filing of the complaint in this action,
2 defendants NORDSTROM and DOES 1-10, Inclusive, both willfully and
3 negligently violated the California Consumer Credit Reporting Agencies Act in at
4 least the following ways:

5 By willfully and negligently furnishing to credit reporting agencies
6 information about the Plaintiff which Defendants NORDSTROM and DOES 1-
7 10, Inclusive knew, or should have known, was incomplete or inaccurate.

8 27. Each of the Defendants NORDSTROM and DOES 1-10, Inclusive
9 willfully and negligently failed in their obligations to reinvestigate and correct the
10 derogatory marks in Plaintiff's credit reports. Plaintiff alleges that each of the
11 Defendants NORDSTROM and DOES 1-10, Inclusive' policies and practices
12 hinder and obstruct adequate and meaningful reinvestigations, and that each
13 defendant knows of this effect of its policies and practices.

14 28. As a proximate result of the willful and negligent actions of the
15 Defendants NORDSTROM and DOES 1-10, Inclusive, and each of them, Plaintiff
16 has suffered both general and special damages in an amount which will be proven
17 at time of trial. As provided under the cited laws, Plaintiff is entitled to actual
18 damages, loss of wages, damage to credit reputation, pain and suffering, costs and
19 attorney fees. Plaintiff is also entitled to punitive damages and statutory penalties
20 for willful violations of the California Consumer Credit Reporting Agencies Act.

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23 WHEREFORE, Plaintiff prays for judgment as follows:

- 24 1. For general and special damages according to proof at trial;
25 2. For statutory penalties for each separate statutory violation where
26 allowed by statute;
27 3. For punitive damages against defendants according to proof at trial and
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1 using the applicable punitive damages standards from the involved statutes;

2 4. For attorney's fees where authorized by statute or law;

3 5. For costs of suit;

4 6. For such other relief as the court deems just and proper.

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6 **PLAINTIFF DEMANDS A JURY TRIAL**

7 Dated: August 14 2012

ROBERT F. BRENNAN, A P.C.

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9 By: 

Robert F. Brennan

10 Attorneys for Plaintiff
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Robert F. Brennan SBN 132449
 LAW OFFICES OF ROBERT F. BRENNAN
 3150 Montrose Ave.
 La Crescenta CA 91214
 Tel: 818-249-5291

UNITED STATES DISTRICT COURT
 CENTRAL DISTRICT OF CALIFORNIA

SHAHIN ADIBI, an Individual;

CASE NUMBER

PLAINTIFF(S)

v.

CV12-07036 TEM

EQUIFAX INFORMATION SERVICES LLC, is a
 Corporation; NORDSTROM, INC., is a business
 entity form unknown;, and DOES 1-10, Inclusive,
 DEFENDANT(S).

SUMMONS

TO: DEFENDANT(S):

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it), you must serve on the plaintiff an answer to the attached ☒ complaint ☐ amended complaint ☐ counterclaim ☐ cross-claim or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff's attorney, Robert F Brennan, whose address is LAW OFFICES OF ROBERT F. BRENNAN 3150 Montrose Ave. La Crescenta CA 91214. If you fail to do so, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

AUG 15 2012

Clerk, U.S. District Court

Dated: _____

By: _____

Deputy Clerk

(Seal of the Court)

[Use 60 days if the defendant is the United States or a United States agency, or is an officer or employee of the United States. Allowed 60 days by Rule 12(a)(3)].

UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA
CIVIL COVER SHEET

I (a) PLAINTIFFS (Check box if you are representing yourself <input type="checkbox"/> SHAHIN ADIBI, an Individual;	DEFENDANTS EQUIFAX INFORMATION SERVICES LLC, is a Corporation; NORDSTROM, INC., is a business entity form unknown,, and DOES 1-10, Inclusive,
(b) County of Residence of First Listed Plaintiff (Except in U.S. Plaintiff Cases): Los Angeles County	County of Residence of First Listed Defendant (In U.S. Plaintiff Cases Only): Los Angeles, California
(c) Attorneys (Firm Name, Address and Telephone Number. If you are representing yourself, provide same.) Robert F. Brennan, Esq. SBN 132449 LAW OFFICES OF ROBERT F. BRENNAN 3150 Montrose Ave. La Crescenta, CA 91214 Telephone 818-249-5291	Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an X in one box only.) <input type="checkbox"/> 1 U.S. Government Plaintiff <input checked="" type="checkbox"/> 3 Federal Question (U.S. Government Not a Party) <input type="checkbox"/> 2 U.S. Government Defendant <input type="checkbox"/> 4 Diversity (Indicate Citizenship of Parties in Item III)	III. CITIZENSHIP OF PRINCIPAL PARTIES - For Diversity Cases Only (Place an X in one box for plaintiff and one for defendant.) <table style="width:100%;"> <tr> <td style="width:33%;">Citizen of This State</td> <td style="width:10%;">PTF <input type="checkbox"/> 1</td> <td style="width:10%;">DEF <input type="checkbox"/> 1</td> <td style="width:33%;">Incorporated or Principal Place of Business in this State</td> <td style="width:10%;">PTF <input type="checkbox"/> 4</td> <td style="width:10%;">DEF <input type="checkbox"/> 4</td> </tr> <tr> <td>Citizen of Another State</td> <td>PTF <input type="checkbox"/> 2</td> <td>DEF <input type="checkbox"/> 2</td> <td>Incorporated and Principal Place of Business in Another State</td> <td>PTF <input type="checkbox"/> 5</td> <td>DEF <input type="checkbox"/> 5</td> </tr> <tr> <td>Citizen or Subject of a Foreign Country</td> <td>PTF <input type="checkbox"/> 3</td> <td>DEF <input type="checkbox"/> 3</td> <td>Foreign Nation</td> <td>PTF <input type="checkbox"/> 6</td> <td>DEF <input type="checkbox"/> 6</td> </tr> </table>	Citizen of This State	PTF <input type="checkbox"/> 1	DEF <input type="checkbox"/> 1	Incorporated or Principal Place of Business in this State	PTF <input type="checkbox"/> 4	DEF <input type="checkbox"/> 4	Citizen of Another State	PTF <input type="checkbox"/> 2	DEF <input type="checkbox"/> 2	Incorporated and Principal Place of Business in Another State	PTF <input type="checkbox"/> 5	DEF <input type="checkbox"/> 5	Citizen or Subject of a Foreign Country	PTF <input type="checkbox"/> 3	DEF <input type="checkbox"/> 3	Foreign Nation	PTF <input type="checkbox"/> 6	DEF <input type="checkbox"/> 6
Citizen of This State	PTF <input type="checkbox"/> 1	DEF <input type="checkbox"/> 1	Incorporated or Principal Place of Business in this State	PTF <input type="checkbox"/> 4	DEF <input type="checkbox"/> 4														
Citizen of Another State	PTF <input type="checkbox"/> 2	DEF <input type="checkbox"/> 2	Incorporated and Principal Place of Business in Another State	PTF <input type="checkbox"/> 5	DEF <input type="checkbox"/> 5														
Citizen or Subject of a Foreign Country	PTF <input type="checkbox"/> 3	DEF <input type="checkbox"/> 3	Foreign Nation	PTF <input type="checkbox"/> 6	DEF <input type="checkbox"/> 6														

IV. ORIGIN (Place an X in one box only.)

<input checked="" type="checkbox"/> 1 Original Proceeding	<input type="checkbox"/> 2 Removed from State Court	<input type="checkbox"/> 3 Remanded from Appellate Court	<input type="checkbox"/> 4 Reinstated or Reopened	<input type="checkbox"/> 5 Transferred from another district (specify):	<input type="checkbox"/> 6 Multi-District Litigation	<input type="checkbox"/> 7 Appeal to District Judge from Magistrate Judge
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V. REQUESTED IN COMPLAINT: JURY DEMAND: ☒ Yes ☐ No (Check 'Yes' only if demanded in complaint.)

CLASS ACTION under F.R.C.P. 23: ☐ Yes ☒ No **MONEY DEMANDED IN COMPLAINT:** \$ 300,000

VI. CAUSE OF ACTION (Cite the U.S. Civil Statute under which you are filing and write a brief statement of cause. Do not cite jurisdictional statutes unless diversity.)
 Fair Credit Reporting Act 15 U.S.C. Sec. 1681

VII. NATURE OF SUIT (Place an X in one box only.)

OTHER STATUTES <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce/ICC Rates/etc. <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input checked="" type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities /Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Act <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act. <input type="checkbox"/> 895 Freedom of Info. Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes	CONTRACT <input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loan (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	TORTS PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Fed. Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury-Med Malpractice <input type="checkbox"/> 365 Personal Injury-Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability	TORTS PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability BANKRUPTCY <input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 CIVIL RIGHTS <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 444 Welfare <input type="checkbox"/> 445 American with Disabilities - Employment <input type="checkbox"/> 446 American with Disabilities - Other <input type="checkbox"/> 440 Other Civil Rights	PRISONER PETITIONS <input type="checkbox"/> 510 Motions to Vacate Sentence Habeas Corpus <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus/Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition CORPORATE/PENALTY <input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 R.R. & Truck <input type="checkbox"/> 650 Airline Regs <input type="checkbox"/> 660 Occupational Safety /Health <input type="checkbox"/> 690 Other	LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS-Third Party 26 USC 7609
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VIII(a). IDENTICAL CASES: Has this action been previously filed and dismissed, remanded or closed? ☒ No ☐ Yes

If yes, list case number(s):

FOR OFFICE USE ONLY: Case Number: _____

**UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA
CIVIL COVER SHEET**

AFTER COMPLETING THE FRONT SIDE OF FORM CV-71, COMPLETE THE INFORMATION REQUESTED BELOW.

VIII(b). RELATED CASES: Have any cases been previously filed that are related to the present case? ☒ No ☐ Yes

If yes, list case number(s): _____

Civil cases are deemed related if a previously filed case and the present case:

- (Check all boxes that apply) ☐ A. Arise from the same or closely related transactions, happenings, or events; or
☐ B. Call for determination of the same or substantially related or similar questions of law and fact; or
☐ C. For other reasons would entail substantial duplication of labor if heard by different judges; or
☐ D. Involve the same patent, trademark or copyright, and one of the factors identified above in a, b or c also is present.

IX. VENUE: List the California County, or State if other than California, in which EACH named plaintiff resides (Use an additional sheet if necessary)

- ☐ Check here if the U.S. government, its agencies or employees is a named plaintiff.
 Los Angeles, California

List the California County, or State if other than California, in which EACH named defendant resides. (Use an additional sheet if necessary).

- ☐ Check here if the U.S. government, its agencies or employees is a named defendant.
 EQUIFAX - Georgia
 Nordstrom - Washington

List the California County, or State if other than California, in which EACH claim arose. (Use an additional sheet if necessary)

- Note: In land condemnation cases, use the location of the tract of land involved.
 Los Angeles County

X. SIGNATURE OF ATTORNEY (OR PRO PER): _____

Date August 15, 2012

Notice to Counsel/Parties: The CV-71 (JS-44) Civil Cover Sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law. This form, approved by the Judicial Conference of the United States in September 1974, is required pursuant to Local Rule 3-1 is not filed but is used by the Clerk of the Court for the purpose of statistics, venue and initiating the civil docket sheet. (For more detailed instructions, see separate instructions sheet.)

Key to Statistical codes relating to Social Security Cases:

Nature of Suit Code	Abbreviation	Substantive Statement of Cause of Action
861	HIA	All claims for health insurance benefits (Medicare) under Title 18, Part A, of the Social Security Act, as amended. Also, include claims by hospitals, skilled nursing facilities, etc., for certification as providers of services under the program. (42 U.S.C. 1935FF(b))
862	BL	All claims for "Black Lung" benefits under Title 4, Part B, of the Federal Coal Mine Health and Safety Act of 1969. (30 U.S.C. 923)
863	DIWC	All claims filed by insured workers for disability insurance benefits under Title 2 of the Social Security Act, as amended; plus all claims filed for child's insurance benefits based on disability. (42 U.S.C. 405(g))
863	DIWW	All claims filed for widows or widowers insurance benefits based on disability under Title 2 of the Social Security Act, as amended. (42 U.S.C. 405(g))
864	SSID	All claims for supplemental security income payments based upon disability filed under Title 16 of the Social Security Act, as amended.
865	RSI	All claims for retirement (old age) and survivors benefits under Title 2 of the Social Security Act, as amended. (42 U.S.C. (g))